

1  
2  
3  
4  
5  
6  
7  
8 **UNITED STATES DISTRICT COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
10 **SAN FRANCISCO DIVISION**

11 *In re Ex Parte* Application of  
12 PALANTIR TECHNOLOGIES INC.,

13 Applicant,

14 For an Order Pursuant to 28 U.S.C. § 1782 to  
15 Obtain Discovery from MARC L.  
16 ABRAMOWITZ for Use in Foreign  
17 Proceedings.

CASE NO.: 3:18-mc-80132-JSC

**STIPULATION REGARDING MARC L.  
ABRAMOWITZ'S ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL**

1 WHEREAS, on August 13, 2018, Palantir Technologies Inc. (“Palantir”) filed an *Ex Parte*  
 2 Application for an Order Pursuant to 28 U.S.C. § 1782 Granting Leave to Obtain Discovery for  
 3 Use in Foreign Proceedings (Dkt. No. 1);

4 WHEREAS, on September 7, 2018, Marc L. Abramowitz (“Abramowitz”) filed an  
 5 Opposition to Palantir’s *Ex Parte* Application;

6 WHEREAS, Palantir opposes Abramowitz’s public filing of a Preferred Stock Transfer  
 7 Agreement from August 2012 (the “2012 Transfer Agreement”), as well as certain emails related  
 8 thereto;

9 WHEREAS, on September 7, 2018, Abramowitz moved pursuant to Civil Local Rules 7-11  
 10 and 79-5 for an order to file under seal the 2012 Transfer Agreement (*i.e.*, Exhibit G to the  
 11 Declaration of Stephen L. Wohlgemuth in Support of Abramowitz’s Administrative Motion to File  
 12 Documents Under Seal), certain emails related thereto (*i.e.*, Exhibit H to the Declaration of Stephen  
 13 L. Wohlgemuth in Support of Abramowitz’s Administrative Motion to File Documents Under  
 14 Seal), and quotes from, and discussions of the substance of, the 2012 Transfer Agreement;

15 THEREFORE, the parties stipulate as follows: the 2012 Transfer Agreement and certain  
 16 emails related thereto shall be filed under seal.

17 IT IS STIPULATED.

18 Dated: September 7, 2018

By /s/ Jack P. DiCanio  
 SKADDEN, ARPS, SLATE, MEAGHER & FLOM  
 LLP  
 Jack P. DiCanio (SBN 138782)  
 jack.dicanio@skadden.com  
 Allen Ruby (SBN 47109)  
 allen.ruby@skadden.com  
 525 University Avenue, Suite 1400  
 Palo Alto, California 94301  
 Telephone: (650) 470-4500  
 Facsimile: (650) 470-4570

24 Dated: September 7, 2018

By /s/ David Y. Livshiz  
 FRESHFIELDS BRUCKHAUS DERINGER US LLP  
 David Y. Livshiz  
 David.livshiz@freshfields.com  
 601 Lexington Avenue, 31<sup>st</sup> Floor  
 New York, New York 10022  
 Telephone: (212) 277-4000  
 Facsimile: (212) 277-4001

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**SIGNATURE ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from any other signatory to this document.

/s/ Jack P. DiCanio  
Jack P. DiCanio